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July 28, 2005

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ex Parte Communication
WT Docket No. 02-353
Service Rules for Advanced Wireless Services in the 1.7 and 2.1
GHz Bands

Dear Ms. Dortch:

SunCom Wireless Operating Company, L.L.C., f/k/a Triton PCS Operating Company, L.L.C. ("SunCom"), by its attorneys, submits this ex parte letter to reiterate its support for the proposal filed in the above-captioned docket by T-Mobile USA, Inc. ("T-Mobile") and Rural Telecommunications Group, Inc. ("RTG") on March 11, 2005. After studying other proposals submitted for Advanced Wireless Services ("AWS") in the 1710-1755 and 2110-2155 MHz bands, 1/ SunCom believes that the T-Mobile/RTG proposal would achieve the best balance between large and small licensing areas as well as large and small spectrum block offerings.

As SunCom stated in its May 20 ex parte filing, 2/ the T-Mobile/RTG band plan "would create realistic opportunities for regional and local carriers

1/ See Service Rules for Advanced Wireless Services in the 1.7 and 2.1 GHz Bands, *Report and Order*, 18 FCC Rcd 25612 (2003) ("Report and Order").

2/ Letter from Michele C. Farquhar and Matthew F. Wood, Attorneys for SunCom Wireless Operating Company, L.L.C., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 02-353, at 2 (filed May 20, 2005).

operating in smaller and underserved markets to offer their subscribers new advanced services.” SunCom has also studied the band plans submitted by MetroPCS [3/](#) and Verizon Wireless [4/](#) in this proceeding, but remains convinced that the T-Mobile/RTG band plan would better promote competition in all areas of the country, including rural and underserved areas, by allowing national and regional carriers to utilize spectrum blocks sized appropriately for both types of carriers.

Finally, SunCom remains interested in bidding for EAs and MSAs/RSAs in the upcoming AWS auction, as noted its June 17 ex parte filing. [5/](#) Therefore, SunCom prefers an AWS band plan with EAs located adjacent to other EAs as well as MSAs/RSAs, and “would be most interested in a band plan configuration with adjacent EA blocks.” [6/](#)

Should you have any questions concerning this submission, kindly contact the undersigned.

Sincerely,

/s/ Michele C. Farquhar

Michele C. Farquhar

Counsel to SunCom Wireless Operating
Company, L.L.C.

cc: Blaise Scinto
Peter Corea
Jennifer Tomchin

[3/](#) Letter from Carl W. Northrop, Counsel for MetroPCS Communications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 02-353 (filed June 29, 2005).

[4/](#) Letter from Charla M. Rath, Verizon Wireless, to Marlene Dortch, Secretary, Federal Communications Commission, WT Docket No. 02-353 (filed May 27, 2005).

[5/](#) Letter from Michele C. Farquhar, Counsel to SunCom Wireless Operating Company, L.L.C., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 02-353 (filed June 17, 2005).

[6/](#) *Id.* at 2.